

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**KARLA MCLAIN,**

*Plaintiff,*

vs.

**FOSSIL PARTNERS, LP, and**

**FOSSIL, INC.,**

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO.4:13-cv-00264**

**JOINT MOTION FOR DISMISSAL WITH PREJUDICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Karla McLain and Defendants Fossil Partners, L.P. and Fossil Group, Inc. (incorrectly named Fossil, Inc.) file this Joint Motion for Dismissal with Prejudice (“Joint Motion”), and respectfully show as follows:

**I.**

Plaintiff and Defendants have resolved the matters in dispute between them with regard to the above numbered and entitled litigation. As part of this Joint Motion, Plaintiff has agreed to dismiss all claims which were or could have been asserted in this suit against Defendants with prejudice. Furthermore, Defendants agree to dismiss all claims that were or could have been asserted in this suit against Plaintiff.

**II.**

For the foregoing reasons, Plaintiff and Defendants request that the Court enter an Order in the form submitted contemporaneously herewith: (1) dismissing with prejudice all claims by Plaintiff against Defendants; (2) dismissing with prejudice all claims that were or could have been asserted in this suit by Defendants against Plaintiff (3) taxing all court costs against each

**JOINT MOTION FOR DISMISSAL WITH PREJUDICE** – Page 1

party incurring the same; and (4) instructing the Court Clerk to close this case and remove it from the Court's docket.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants request that the Court enter the Joint Motion prayed for herein above.

DATED: January 3, 2014

Respectfully submitted,

/s/ Ronald R. Huff by permission

Ronald R. Huff  
(SBN 10185050)  
Attorney and Counselor at Law  
112 South Crockett Street  
Sherman, Texas 75090  
(903) 893-1616 (telephone)  
(903) 813-3265 (facsimile)  
[ronhuff@gcecisp.com](mailto:ronhuff@gcecisp.com)

**ATTORNEY FOR PLAINTIFF**

/s/ Michael P. Royal

Michael P. Royal  
Texas Bar No. 00784886  
Annie Lau  
Texas Bar No. 24057723  
FISHER & PHILLIPS LLP  
500 N. Akard Street  
Suite 3550  
Dallas, Texas 75201  
Tel: (214) 220-9100  
Fax: (214) 220-9122  
[mroyal@laborlawyers.com](mailto:mroyal@laborlawyers.com)  
[alau@laborlawyers.com](mailto:alau@laborlawyers.com)

**ATTORNEYS FOR DEFENDANTS**